

## **REMARKS**

Please reconsider the claims in the application in view of the remarks below. In the present application, claims 1-15 remain pending.

### **Claim Objections**

The Office Action objected to claim 15 because of informality. Specifically, the Office Action alleges that page 17, fifth paragraph does not fully support “updates only changed portion of the view displayed on said display.” The second sentence of that paragraph describes in verbatim, “Thus, the view B is updated so that unchanged portions in model B are displayed as it were before the update and the changed portion in which the change is reflected is displayed.” Applicant believes that passage makes it clear that only the changed portion is updated on the display. For additional support, the Examiner is directed to the third paragraph of page 14, which reads, “The event allows the view to maintain the display of an unchanged portion of the source model and update the display of a portion corresponding to the change made to the source model.” That passage also supports claim 15.

### **Claim Rejections – 35 U.S.C. §103(a)**

Claims 1-15 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over the background section of the specification in the present application, referred to by the Examiner as APA, in view of U.S. Patent No. 6,934,740 to Lawande et al. (hereinafter, “Lawande”). The Office Action also rejected claims 1-15 under 35 U.S.C. §103(a) as allegedly being unpatentable over APA in view of U.S. Patent No. 6,389,423 to Sakakura (hereinafter, “Sakakura”). The Office Action alleges that APA discloses all elements claimed in independent

claims except for “event generator.” According to the Office Action’s allegation, Lawande and Sakakura individually fill that gap.

While applicants do not agree with the rejection as will be explained below, applicants in this reply are amending independent claims 1, 6, 7, 11 and 12 to further clarify that an automatic report is received at a model converter when a change to the first model occurs. Thus, upon a change to the first model, second model is updated automatically. Further, the automatic update to the second model also automatically triggers or generates an event to update the view to the second model. Thus, an automatic and dynamic change of the view is implemented in application editing. Support for the amendment can be found at least on page 18 and Figure 4 of the originally submitted specification.

The cited passages from the background section of the originally submitted specification describe some the known methods for providing a view to an application model. Specifically, paragraph 0026, which the Examiner cites, characterizes known editors that display a source model in a source code view. That paragraph recounts that a user must manually perform an explicit operation in order to see a preview display updated based on an edit. Paragraphs 0005-0008 on page 2 describe an application having interfaces to different views for a model.

On the other hand, independent claims in the present application recite, editing “an application having a model and a view separated from each other.” That is, the model does not have the specific interface to the view, unlike the known applications referred to on page 2, paragraphs 0005-0008. Further, independent claims as amended recite, “receiving an automatic reporting of an update”, unlike the application described in paragraph 0026, in which a user must explicitly call a function.

For at least the above-reasons, applicants believe that APA does not disclose or suggest the elements of the independent claims as alleged in the Office Action.

Conceding that APA does not disclose the claimed “event generator”, the Examiner contends that Lawande, and alternatively Sakakura, disclose that element. Applicants must disagree. Lawande is directed to sharing common data objects among multiple applications in a client device. In col. 28, lines 38-39, Lawande specifically discloses, “each application effectively utilizes *the same user interface program...*” (emphasis added). On the other hand, the claims in the present application are concerned with displaying a view in an application having a model object and a view object separated from each other, for example, displaying a model in a given application in a view in another application.

Furthermore, while the cited sections of Lawande refer to synchronizing “calendar events” from a database among different client devices such as PC and PID, Lawande does not disclose or suggest, “event generator for generating an event based on an update in said second model if said second model is updated based on an edit of said first model made by said editing module and updates changed portion of the view displayed on said display device based on the event generated by said event generator,” claimed in independent claim 1 and similarly claimed in independent claims 6, 7, 11, 12 and 15.

The events to which Lawande refers are not generated based on an update. Rather, Lawande’s events are calendar events, that is, a log of what is happening on certain date or time that is input into the database. Upon receiving a synchronization request, Lawande appears to search the database for new, modified or deleted events. Lawande, however, does not disclose or suggest, generating an event based on a change in a model of a different application. Thus,

Lawande does not disclose or suggest “generating an event” let alone a “view display module” that “updates changed portion of the view displayed on said display device.”

With respect to claim 6, the Examiner in the Office Action cursorily dismisses this claim as reciting the same elements as those of the claims 2-5. Applicants must again disagree. Claim 6 specifically refers to “an event converter for converting an event...”. Unlike the Examiner’s contention, this element is not recited in claims 2-5. In this regard, applicants respectfully request that the Examiner peruse the claims in light of the specification for further understanding of what is being claimed. An event converter, for example, is described in the specification on pages 30-32 and figures 15 and 16. To reiterate, Lawande does not disclose or suggest at least, “an event converter for converting an event causing an update made to said first model to be reflected in a view of said first model into an event changing the view of said second model by using a conversion rule for converting said first model into said second model.” Thus, this additional reason further distinguishes claim 6 from Lawande.

Similarly, Sakakura fails make up for which Lawande does not teach as proffered above. That is, while Sakakura appears to disclose synchronizing data, Sakakur also does not disclose or suggest at least, “event generator for generating an event based on an update in said second model if said second model is updated based on an edit of said first model made by said editing module and updates changed portion of the view displayed on said display device based on the event generated by said event generator.”

The Supreme Court of the United States has made it clear that, “[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.” *KSR International Co. v. Teleflex Inc.*, 82 USPQ.2d 1385, 1396 (U.S. 2007)

(citing, *In re Kahn*, 441 F.3d 977, 988 (CA Fed. 2006)). "It can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does." 82 USPQ.2d at 1396. The Examiner has yet to articulate a clear rationale underpinning to support the legal conclusion of obviousness. Rather, the Examiner merely engages in making conclusory statements.

With respect to the double patenting rejection, applicants defer submitting a terminal disclaimer until the claims are indicated allowable.

In view of the foregoing, this application is now believed to be in condition for allowance, and a Notice of Allowance is respectfully requested. If the Examiner believes a telephone conference might expedite prosecution of this case, applicant respectfully requests that the Examiner call applicant's attorney at (516) 742-4343.

Respectfully submitted,



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